



agreed to an extension of 7 days for the deadline to file responses to the *Daubert* and dispositive motions, extending the deadline from February 26, 2021 to March 5, 2021. Further, the parties have agreed to an extension of 5 days for the deadline to file replies in support of the *Daubert* and dispositive motions, extended the deadline from 14 days from service of the responsive motions to 19 days from the service of the responsive motions.

4. Per this extension, the briefing on the *Daubert* and dispositive motions will be completed by March 24, 2021.
5. There is ample room in the schedule to extend this schedule; the proposed schedule remains in compliance with Local Rule LR16.01(d)(2.f). The next deadline in the Amended Case Management Order is the June 4, 2021 deadline to file a final report regarding mediation. In addition, trial is set to begin August 3, 2021, well more than 90 days after the completion of the briefing on the dispositive motions. Therefore, this requested extension of the briefing schedule for the *Daubert* and dispositive motions will not affect other deadlines in this case or the trial date.

For the reasons stated herein, which they submit constitute good cause for the requested relief, the parties jointly request that the Court amend the Case Management Order to grant an extension of the briefing schedule for the *Daubert* and dispositive motions, as set in the Amended Case Management Order (Dkt. 260), as discussed above. A proposed order is attached to this Motion.

Dated: February 8, 2021

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